

# Exhibit A

## FEDERAL PROTECTIVE SERVICE

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CASE NUMBER F25090070999 / 25006707D		Occur Date Span 02/25/2025thru02/25/2025	Occur Time Span 09:50thru18:31	Report Date 02/25/2025	Report Time 10:05								
<input type="checkbox"/> Follow – Up Report													
A	Code	Type of Offense or Incident Assault Offenses: Aggravated Assault		Arrive Date 02/25/2025	Arrive Time 10:05								
	Building No. CA0150	Address 300 NORTH LOS ANGELES STREET, LOS ANGELES, CA 90012			Rtn to Svc Dt 02/25/2025								
	Incident Location 7th Floor Hallway		Agency Name Tenant Not Found		Rtn to Svc Tm 18:31								
			Agency Code 99999										
	Est Num Dem	1-10	11-50	51-100	101-300	301-500	500+	Est Num Evc	1-10	11-50	51-100	101-300	301-500
NARRATIVE SEE NARRATIVE CONTINUATION													

INVOLVED PERSON		<input checked="" type="checkbox"/>	Victim	<input type="checkbox"/>	Witness	<input type="checkbox"/>	Suspect	<input type="checkbox"/>	Subject	<input type="checkbox"/>	Report Person	<input checked="" type="checkbox"/>	Govt' Empl	<input type="checkbox"/>	Govt' Cont	<input type="checkbox"/>	Other	<input type="checkbox"/>	Missing Person
B	No.	Name (last, first, middle)		Alias		Date of Birth/Age		Sex	Race	Height	Weight	Eyes	Hair						
	1	ROBLES, IVAN																	
	Address		City		State	Zip Code	Country United States of America												
	Driver's License Number	State CA	Social Security #		Nationality		Country of Birth		Home Phone										
	Scars, Marks, Tattoos / Other		Arrested	Citation Number		NCIC Number		Work Phone											
Employer U.S. IMMIGRATION & CUSTOMS ENFORCEMENT (ICE)		Employer City Los Angeles		State CA	Employer Zip 90012	Employer Country													

INVOLVED PERSON		<input type="checkbox"/>	Victim	<input checked="" type="checkbox"/>	Witness	<input type="checkbox"/>	Suspect	<input type="checkbox"/>	Subject	<input type="checkbox"/>	Report Person	<input checked="" type="checkbox"/>	Govt' Empl	<input type="checkbox"/>	Govt' Cont	<input type="checkbox"/>	Other	<input type="checkbox"/>	Missing Person
B	No.	Name (last, first, middle)		Alias		Date of Birth/Age		Sex	Race	Height	Weight	Eyes	Hair						
	2	HISLE, FARRIS M.																	
	Address		City		State	Zip Code	Country United States of America												
	Driver's License Number	State CA	Social Security #		Nationality		Country of Birth		Home Phone										
	Scars, Marks, Tattoos / Other		Arrested	Citation Number		NCIC Number		Work Phone											
Employer U.S. IMMIGRATION & CUSTOMS ENFORCEMENT (ICE)		Employer City Los Angeles		State CA	Employer Zip 90012	Employer Country													

VEHICLE		<input type="checkbox"/>	Stolen	<input type="checkbox"/>	Damaged	<input type="checkbox"/>	Recovered	<input type="checkbox"/>	Lost/Missing	<input type="checkbox"/>	Suspect	<input type="checkbox"/>	Other	<input type="checkbox"/>	Govt	Evidence	
C	No.	License No	State	Reg Yr	Make	Model		Veh Yr	Value								
	R/O Name (last, first, middle)		Color	VIN		NCIC Number											
	R/O Address		City	State	Zip Code	Country											

PROPERTY		<input type="checkbox"/>	Stolen	<input type="checkbox"/>	Damaged	<input type="checkbox"/>	Recovered	<input type="checkbox"/>	Suspect	<input type="checkbox"/>	Found	<input type="checkbox"/>	Other	<input type="checkbox"/>	Govt	Evidence	Weapon
D	No.	Type: Description:	Make		Model		Color										
	Owner Name (first, last, middle)		Serial Number		Value		NCIC Number										
	Address		City	State	Zip Code	Country											

Officer Name/Signature/ID# KORI LEOPOLDO	Date 03/04/2025 22:04	Supervisor Daniel M Dick	Date Approved 03/04/2025 23:49
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Distribution: ☐ Investigations ☐ AUSA ☐ Local Prosecutor ☐ RO ☐ Other  
Case Status: ☐ Open ☐ Closed ☐ Unfounded \*\* FOR OFFICIAL USE ONLY \*\*

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INVOLVED PERSON		Victim	Witness	Suspect	X	Subject	Report Person	Govt' Empl	Govt' Cont	Other	Missing Person		
<b>B</b>	No.	Name (last, first, middle)		Alias			Date of Birth/Age	Sex	Race	Height	Weight	Eyes	Hair
	3	ZAITSEV, MAKSIM					04/28/1989	M		69	165	Blue	Brown
	Address			City			State	Zip Code	Country				
	655 Baker St. T102			Costa Mesa			CA	92626	United States of America				
	Driver's License Number		State	Social Security #		Nationality	Country of Birth		Home Phone				
	W8614458					Russian							
	Scars, Marks, Tattoos / Other			Arrested	Citation Number			NCIC Number		Work Phone			
				Yes									
	Employer			Employer City			State	Employer Zip	Employer Country				
							CA						

**Narrative Continuation**

Witness: FARRIS HISLE

Victim: IVAN ROBLES

The Participant was injured.

Subject: MAKSIM ZAITSEV

The Participant was injured.

Origin:

On 02/25/2025 at 1008 hours, I, Inspector Leopoldo #1528, was performing my duties with the Federal Protective Service (FPS) and was notified via radio by the Denver MegaCenter (DMC) of an Immigration and Customs Enforcement (ICE) agent that was bitten by a male subject at 300 N. Los Angeles St., Los Angeles, CA 90012. The aforementioned address is the Los Angeles Federal Building (LAFB). All times are approximate.

Observations:

Upon arrival, I observed a Hispanic Male Adult (HMA), later positively identified by California Driver's License (CA DL# [REDACTED]) as Ivan Robles (ROBLES) sitting in a chair with his left pinky wrapped in gauze. I observed a laceration to the pinky with skin broken and dry blood (see attached photos).

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Investigation:

At 1015 hours, Inspector Mutuc #1603 and I arrived on scene. I made contact with ICE Deportation Officer (DO) ROBLES and observed his injury to his pinky. At 1017 hours, emergency medical personnel with Los Angeles Fire Department (LAFD) arrived on scene to care for ROBLES. LAFD advised ROBLES should be transported to the hospital. ROBLES opted to self-transport to White Memorial Hospital. At 1023 hours, I contacted Christina Shay with the United States Attorney's Office (USAO), she advised that FPS needs to file a Criminal Complaint. Supervisory Detention and Deportation Officer (SDDO) Hicks, who was present, stated witnessed part of the incident. I requested SDDO Hicks to provide a written statement. At 1026 hours, I contacted FPS Special Agent (SA) Smith to request assistance with the case. SA Smith was in Riverside conducting a separate investigation. In coordination with SA Smith, I was advised to write the affidavit.

At 1038 hours, I conducted an in-person recorded interview of the victim, ROBLES (see attached recording). The information I gathered from the interview was the following:

DO Valenzuela asked ROBLES to assist in taking a husband and wife into custody. DO ROBLES and DO Farris Hisle (HISLE), later positively identified by California State issued Driver's License (CA DL# [REDACTED]), were going to take the male subject, later positively identified by California State issued Driver's License (CA DL#W8614458) as Maksim Zaitsev (ZAITSEV) into custody first and arrest him. DO Valenzuela and female DO Garcia were going to later take the female subject into custody. HISLE called in ZAITSEV from the public area to the non-public area. HISLE positively identified the subject, and ROBLES conducted a pat down and emptied out his pockets. As HISLE applied the first handcuff, that's when the subject realized he was being arrested. ZAITSEV started actively resisting by tensing up, they were able to apply the second handcuff. About a minute later they walked him through the inside of the non-detained area into the hallway. As they were walking to the freight elevator the subject started yelling in Russian. ROBLES assumed the subject was trying to tip off his wife that was set to be arrested. As ROBLES and HISLE continued to escort ZAITSEV, ZAITSEV dropped his weight and turned around and continued yelling. ROBLES placed his left hand on ZAITSEV's face to turn his head and continue walking forward. ZAITSEV then bit ROBLES' left pinky. ROBLES told HISLE that ZAITSEV was biting him. ROBLES began striking ZAITSEV approximately 3 times, HISLE also struck ZAITSEV until he released ROBLES's pinky finger from his mouth. ROBLES stated it felt like ZAITSEV was biting his finger for what felt like a minute. At that time, ROBLES, HISLE, and ZAITSEV were on the ground. One of the Spectrum officers, Martin, came to assist by holding down his legs until back up arrived. ROBLES felt pain and numbness in his finger. ROBLES also observed that his finger was bleeding. See attached recording for exact transcription.

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At 1045 hours, I went down to B-18 ICE detention area to make contact with ZAITSEV. ZAITSEV was in a holding cell. LAFD personnel were outside of the cell. I asked LAFD if they were transporting ZAITSEV to the hospital, to which they responded, "no." LAFD personnel then departed. At 1052 hours, Inspector Mutuc placed ZAITSEV into handcuffs. I took photographs of ZAITSEV and his injuries while in the cell (see attached photos).

Inspector Mutuc and I then took custody of ZAITSEV and walked him over to the FPS detention cell in the LAFB room B-199. I then used my government issued cell phone to contact the DMC and requested a Russian interpreter from the FPS language line. Inspector Mutuc used his government cell phone to record me reading ZAITSEV his Statement of Rights, Miranda Rights, from my FPS issued card. While translating Zaitsev his rights he interrupted the interpretation. ZAITSEV stated he was going to use his 5th amendment and that he knew his rights. I continued to read ZAITSEV his rights. Due to ZAITSEV opting to use his 5th amendment right, I advised ZAITSEV that we would not further question him so that we do not violate his rights, and the translation was going to be ended (see attached recording).

At 1202 hours, I heard Inspector Toledo say over the radio that EMS was clear to enter. I went to B-199 to see what was going on, ZAITSEV had said he felt dizzy. There was a question if ZAITSEV had received a proper evaluation on LAFD's initial response. I called ICE DO Tsarkov's cell phone to clarify the initial response. According to DO Tsarkov, ZAITSEV stated he was beat up but only requested a band aid. DO Tsarkov further stated it was LAFD's policy to transport everyone that is in custody, so ICE denied his transport. ZAITSEV was then transported by LAFD to the hospital for further evaluation.

At 1418 hours, I made contact with DO HISLE and conducted a recorded in-person interview. The information I gathered from the interview was the following:

At 0950 hours, HISLE entered the visiting area of the 7th floor in attempt to make an arrest for immigration purposes. HISLE called a husband and wife that were set to be arrested. DOs were going to separate them in order to lower the anxiety and emotions when dealing with the arrest. DOs called the husband back first. Initially ZAITSEV and his wife were a little resistant to separate but they obliged. Once the ZAITSEV was back in the visiting room they searched and patted him down. HISLE and ROBLES advised ZAITSEV that he was under arrest for immigration purposes and that his court date was going to be rescheduled. ZAITSEV was passively resistant as HISLE and ROBLES had him against the wall. HISLE and ROBLES were able to get one cuff on, but it was a little more difficult to get the second cuff on because ZAITSEV became actively resistant. ZAITSEV began pulling his arm back and saying that he had a lawyer. HISLE and ROBLES escorted ZAITSEV out of the interview room walking him through the office area. HISLE and ROBLES' intent was to walk ZAITSEV down the hall to the freight area and to the basement for case processing. As soon as they entered the hallway ZAITSEV noticed the entrance to the visiting area was to his right. ZAITSEV looked in that

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direction and began screaming in Russian. HISLE knew ZAITSEV was trying to alert his wife but could not understand what ZAITSEV was saying. HISLE and ROBLES continued to usher ZAITSEV toward the freight elevator and ZAITSEV became more actively resistant to the point where HISLE and ROBLES had to use force. ZAITSEV was pushing off the walls with his feet, becoming dead weight, twisting and turning. At some point on the ground HISLE heard his partner (ROBLES) say that ZAITSEV was biting his finger. HISLE observed ROBLES' finger in ZAITSEV's mouth. Based on their training HISLE and ROBLES used some strikes to release the bite grip from the finger. After that, HISLE and ROBLES called in more restraints. HISLE and ROBLES had ZAITSEV on the ground. ROBLES had to get medical treatment. DOs put ZAITSEV in a position of disadvantage and transported to a padded cell and notified FPS as well as Paramedics for ROBLES and ZAITSEV. [REDACTED]

[REDACTED] ZAITSEV was scheduled to see an immigration judge on July 2nd, 2025; however, upper management wanted them brought into custody immediately. ZAITSEV and his wife's court date would be rescheduled. ZAITSEV had an I-200 arrest warrant for immigration purposes. See attached recording for exact transcription.

After the interview concluded, HISLE further stated that they had used ZAITSEV's sweater to cover his mouth to prevent from biting.

At 1543 hours, I submitted my affidavit to Assistant United States Attorney (AUSA) Joseph Guzman (see attached).

At 1705 hours, U.S. District Court returned the Arrest Warrant and Criminal Complaint signed by U.S. Magistrate Judge Patricia Donahue. I executed the arrest warrant immediately thereafter.

At 1801 hours, after completing booking paperwork, Inspectors Mutuc, Vergara, and I transported ZAITSEV to Bureau of Prisons (BOP) Metropolitan Detention Center (MDC) located at 535 N. Alameda St., Los Angeles, CA 90012. At 1831 hours, ZAITSEV was remanded into BOP custody (see attached prisoner remand form). All units cleared BOP without further incident.

On 02/26/2025 at 0930 hours, I assisted SA Smith and Inspector Lynd with transferring ZAITSEV from BOP to U.S. Marshal custody. SA Smith and Inspector Lynd transported ZAITSEV to 350 W. 1st St., Los Angeles, CA 90012.

At 1119 hours, Inspector Lynd and I conducted a follow up investigation at 300 N. Los Angeles, CA 90012. I met with James Milliner (MILLINER), who is a contract security officer with Spectrum for ICE. MILLINER stated that he heard

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some yelling in the hallway. MILLINER went out to the hallway and assisted ICE officers HISLE and ROBLES by holding ZAITSEV's legs (see attached statement).

I conducted a walkthrough of the area of where the incident occurred. I did not observe any Video Surveillance System (VSS) cameras in the area. DO HISLE pointed out the area where the incident occurred where there was dry blood on the ground (see attached photos). There were 2 cameras in the main lobby of room 7621. ICE SSDO Gonzalez stated that the cameras in the lobby are not operational and do not record.

I began to canvas offices on the 7th floor adjacent to where the incident occurred for potential witnesses. I made contact with USCIS employees. USCIS SA Jack Nasep (NASEP) was working the day prior. NASEP stated that he and a few others, to include his SAC (Special Agent in Charge), all heard banging on the walls and went out to see what was going on. I requested NASEP to give a statement to which he said he would need to ask his SAC. NASEP provided me with his SAC's information. I asked NASEP if anyone captured the incident with their cell phone to which he stated no.

Immediately after, I met with AUSA J [REDACTED] T [REDACTED] (T [REDACTED]) who's office is also adjacent to where the incident occurred. T [REDACTED] canvased for employees in her office and discovered that 2 employees heard or saw something. Neither of her employees exited the office. One employee that she did not name, was peeking through the peephole in their doorway and observed ICE officers walking by in the hallway. One ICE officer shouted get the first aid kit. I requested a statement from both employees.

I spoke with a Paragon employee who works in 7621, the main lobby of ICE. The Paragon employee advised that Paragon Protective Security Officer (PSO) Kearney was working the lobby on 02/25/25. I made contact with Paragon PSO Lieutenant Speed and requested statements from her and PSO Kearney (see attached statements). PSO Kearney stated that he did not see anyone recording with cell phones at the time of incident.

On 02/27/2025 at 1153 hours, I contacted USCIS SAC Victor Cockrell (COCKRELL). I requested that all USCIS employees that were present provide a statement on what they witnessed. SAC COCKRELL stated that he could not afford for all of his employees to be subpoenaed. SAC COCKRELL further stated that he could provide a blanket statement for everyone. I requested individual statements as employees may have different point of views or details. SAC COCKRELL then said he would need to talk with his agency regarding my request and would get back to me.



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This case has been referred to investigations Branch (IB), SA Smith for further investigation.

The following Support Narrative was entered by Axel Toledo, last modified on 02/27/2025.

On Tuesday February 25, 2025, 1132 hours, I met with Inspector B. MUTUC at building 300 basement floor room #B199 where the subject Maksim ZAITSEV was being held at. I saw ZAITSEV and noticed bruises on his face and wrist. ZAITSEV was not complaining of any medical issues at the time when I was there.

At 1135 hours, ZAITSEV said he needed to use the bathroom, so MUTUC and I handcuffed him and escorted him to the bathroom. When we got back ZAITSEV's handcuffs were removed he was placed back in his holding cell. ZAITSEV started to speak but it was difficult to understand him. He did sound like he said something to the effect of ICE is evil. I tried to tell him we can't talk to him, and I tried to use google translate but was unable to do it correctly. Later I asked MUTUC if ZAITSEV had been seen by medical. MUTUC said no, ICE had denied medical and transportation. After hearing this I said we should call emergency medical services (EMS) to have him checked out. That's when Inspector J. LYND arrived. MUTUC explained to LYND the question of having EMS coming out to check ZAITSEV, to which LYND said yes, we should notify Denver Mega Center and request EMS to evaluate ZAITSEV.

At 1157 hours, I notified DMC and requested EMS to our location to have ZAITSEV evaluated.

At 1207 hours, Los Angeles Fire Department EMS arrived on scene and started the evaluation of ZAITSEV.

At 1226 hours, Paramedic 801 transported ZAITSEV to White Memorial Hospital.

The following Support Narrative was entered by Justin Lynd, last modified on 03/03/2025.

On 2/25/2025, at 1008 hours, Inspector Leopoldo #1528 was informed by the Denver Mega Center that an in-custody ICE subject had bitten an ICE officer's hand. The subject was transported to B199 for further processing.

At 1155 hours, I went to B199 to assist with the investigation. Upon my arrival, I observed the subject, identified as Zaitsev, seated on a bench in the holding cell. Zaitsev had multiple lacerations to his head and face. I instructed Inspector Toledo #1616 to notify Los Angeles Fire Department and request for a medical evaluation.

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At 1226 hours, Los Angeles Fire Department personnel arrived on scene and conducted a medical evaluation of Zaitsev.

Zaitsev was transported to White Memorial Hospital for further medical evaluation.

On 2/26/2025, at 1230 hours, I contacted ICE officer Jose Valenzuela. Valenzuela essentially stated the following to me:

On 2/25/25, at 1000 hours, ICE personnel called Zaitsev into the interview room to confirm his identity and place him under arrest. Zaitsev was placed in handcuffs while in the interview room and was being escorted to another part of the facility for further processing. Zaitsev was "getting loud" with ICE personnel Hisle and Robles but could not understand what he was saying due to the language barrier.

Zaitsev was being escorted through the office by Hisle and Robles and proceeded to the hallway of the building and continued to scream in Russian. Valenzuela watched as Zaitsev was escorted into the hallway. Valenzuela proceeded back to the conference room to ensure that Zaitsev's wife was still there. While there, he heard more screaming coming from the hallway and proceeded to where Hisle, Robles and Zaitsev were located. Valenzuela observed all three "on the ground".

Zaitsev became combative with Robles and Hisle to which Hisle attempted to call for additional units or a supervisor. Valenzuela went back to the office in an attempt to contact a supervisor and ask for additional personnel. He then proceeded to where Hisle and Robles were located and observed Spectrum security personnel on scene assisting with Zaitsev. Valenzuela put a "face mask" on Zaitsev's face in an attempt to keep him from biting officers.

Valenzuela helped in escorting Zaitsev to the basement for further processing. He subsequently went back to his office to check the status of Zaitsev's wife. Valenzuela did not observe Robles being bitten by Zaitsev nor did he see any use of force against Zaitsev by Robles or Hisle.

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The following Support Narrative was entered by Benjamin Mutuc, last modified on 03/04/2025.

On 02/25/2025 at 1005 hours, Inspector Leopoldo #1528 and I, Inspector Mutuc #1603 responded to 300 N. Los Angeles Street, Los Angeles, Building 300, 7th floor. regarding an ICE Agent whose fingers were bit by a male subject.

At 1052 hours, before taking custody of subject Zaitsev from ICE, Inspector Leopoldo read him Miranda rights with Ice Agent Tsarkov present and translating in Russian language. Ice Agent Tsarkov was also present while Zaitsev was walked from ICE detainment center to FPS detainment area B-199.

Zaitsev, DOB 04/28/1989., was placed in B-199, cell B. He spoke and understood very little English, and his attempts to communicate were difficult to understand. FPS notified LAFD to respond to B-199 to medically evaluate Zaitsev.

At around 11:15 hours, as I was visually supervising Zaitsev, he started physically demonstrating what had happened to him. although he spoke very little and does not understand English, I tried to explain by means of hand gestures that he had been read his rights, and I could not talk to him about his case. Zaitsev kept demonstrating, despite my attempts to stop him.

At 1226 hours, LAFD personnel and I transported Zaitsev to WMMC for further medical evaluation.

At 1556 hours, Zaitsev was evaluated by WMMC medical staff and cleared him for booking. My self and Inspector Vergara #1609 transported Zaitsev back to 330 N. Los Angeles St. Bldg. 300, B-199 for further processing.

At 1801 hours, Zaitsev was transported to BOP by me, Inspector Vergara and Inspector Leopoldo.

I briefed Inspector Leopoldo on my observation during my supervision with Zaitsev.

The following Support Narrative was entered by MERVIN ORESTES VERGARA, last modified on 02/28/2025.

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On Tuesday, February 25, 2025, at 1157 hours, I Inspector M. Vergara (#9P1609) arrived at the holding facility located at 300 N. Los Angeles St., Los Angeles, CA. 90012, room #B-199.

At 1312 hours, I arrived at White Memorial Hospital's Emergency Room located at 1720 E. Cesar E. Chavez Ave., Los Angeles, CA 90033 to assist Inspector B. Mutuc (#9P1603) with ZAITSEV. Upon my arrival ZAITSEV was handcuffed to the EMS gurney awaiting further medical attention by a physician.

At 1342 hours, a physician ordered x-rays for ZAITSEV in order to determine medical clearance for him to be booked into the Bureau of Prisons (BOP) Metropolitan Detention Center (MDC).

At 1348 hours, I left White Memorial Hospital to assist Inspector A. Toledo (#9P1616) on an unrelated call for service at 300 N. Los Angeles St.

At 1442 hours, I returned to White Memorial Hospital.

At 1556 hours, ZAITSEV was given medical clearance (Okay to book) by the physician. At this time Inspector Mutuc and I began transport of ZAITSEV from White Memorial Hospital to 300 N. Los Angeles St., room #B-199, starting mileage 11,097.

At 1614 hours, we arrived at 300 N. Los Angeles St., ending mileage 11,099.

At 1619 hours, we arrived at room #B-199 and placed ZAITSEV into holding cell B while we waited for his criminal complaint to be written and approved. ZAITSEV's handcuffs were removed at this time.

At 1801 hours, I placed handcuffs on ZAITSEV per DHS FPS Policy. Inspectors Mutuc, K. Leopoldo (#9P1528) and I escorted ZAITSEV to the BOP MDC.

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At 1830 hours, ZAITSEV was placed in BOP custody.

At 1831 hours, all units cleared.

All times are approximate.